

REMARKS/ARGUMENTS

Claims 1-8 are pending in this application. Claims 1, 3, 5, and 7 are independent. Claims 1-8 are amended.

REJECTION UNDER 35 U.S.C. § 103(A)

On pages 2-5, the Office Action rejects claims 1-8 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Published U.S. Patent Application No. 2003/0028654 to Abjanic (hereinafter "Abjanic") in view of Published U.S. Patent Application No. 2003/0097495 to Horvitz (hereinafter "Horvitz"), further in view of U.S. Patent No. 6,629,149 to Fraser (hereinafter "Fraser"), and still further in view of U.S. Patent No. 6,591,260 to Schwarzhoff (hereinafter "Schwarzhoff"). Applicant respectfully traverses this rejection for at least the reasons listed below.

As amended, independent claims 1, 3, 5, and 7 recite, in part, the following subject matter: "the routing information providing a **default action** when a document **does not match** the routing information" (emphasis added). This subject matter finds support in the specification in, for example, paragraph [0030]. Such default action is possible because the routing engine is content-aware.

Abjanic does not disclose, suggest, or teach this subject matter. As correctly conceded on page 3 of the Office Action, Abjanic does not explicitly show "that a

schema document contains the routing rules.” Thus, Abjanic lacks the routing information recited in independent claims 1, 3, 5, and 7.

Horvitz, Fraser, and Schwarzhoff fail to remedy the admitted deficiencies of Abjanic. While page 4 of the Office Action alleges that Horvitz shows a schema document containing routing rules, Horvitz does not provide a default action when a document does not match the routing information in a schema document. Because Horvitz lacks a content-aware routing engine that operates in the recited manner, Horvitz cannot furnish this subject matter.

Moreover, the Office Action does not present a *prima facie* case of obviousness. While Page 4 attempts to add Schwarzhoff to Horvitz, Horvitz to Abjanic, and Fraser to Abjanic, the Office Action does not describe a consolidated combination that incorporates the cited parts of Abjanic, Horvitz, Fraser, and Schwarzhoff. As the Supreme Court stated, “there must be some **articulated reasoning** with some rational underpinning to support the legal conclusion of obviousness.” *KSR Int’l v. Teleflex Inc.*, 127 S. Ct. 1727, 1741 (2007) (quoting *In re Kahn*, 441 F.3d 977, 988 (Fed. Cir. 2006) (emphasis added)). In this case, Applicant respectfully submits that, because the Office Action lacks such articulated reasoning, it has not constructed a *prima facie* combination of the cited references.

Because the references of record do not disclose, teach, or suggest the recited subject matter, Applicant respectfully submits that the Office Action has failed to

establish a *prima facie* case of obviousness. Applicant therefore submits that independent claims 1, 3, 5, and 7 are allowable over the references of record.

Claim 2 depends upon independent claim 1. Claim 4 depends upon independent claim 3. Claim 6 depends upon independent claim 5. Claim 8 depends upon independent claim 7. Thus, Applicant respectfully submits that claims 2, 4, 6, and 8 are allowable at least due to their respective dependencies upon allowable independent claims.

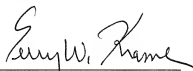
For at least the foregoing reasons, Applicant respectfully requests withdrawal of the rejection of claims 1-8 under 35 U.S.C. § 103(a).

CONCLUSION

While we believe that the instant amendment places the application in condition for allowance, should the Examiner have any further comments or suggestions, it is respectfully requested that the Examiner telephone the undersigned attorney in order to expeditiously resolve any outstanding issues.

In the event that the fees submitted prove to be insufficient in connection with the filing of this paper, please charge our Deposit Account Number 50-0578 and please credit any excess fees to such Deposit Account.

Respectfully submitted,
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